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6 Proposed Attorneys for Archer Norris, a Professional
Law Corporation, Debtor-in-Possession

7 UNITED STATES BANKRUPTCY COURT
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9 NORTHERN DISTRICT OF CALIFORNIA
10
11 SAN FRANCISCO DIVISION

11 In re:

12 ARCHER NORRIS, a Professional
Law Corporation,

13 Debtor-In-
14 Possession.

CASE NO. 18-30924-HLB

Chapter 11

[No Hearing Required]

15
16 **REQUEST TO VACATE ORDER APPROVING STIPULATION PERMITTING**
17 **PURCHASE OF PREPETITION CLAIMS AGAINST CLIENTS FOR (1) EMERGENCY**
PREPETITION COST ADVANCES BY ATTORNEYS; AND (2) ELECTION NOT TO
INVOICE CLIENTS FOR UNPAID PREPETITION COSTS

18 Archer Norris, a Professional Law Corporation, the Debtor and Debtor in Possession
19 herein (the “Debtor”) hereby requests that the Court vacate its Order Approving Stipulation
20 Permitting Purchase of Prepetition Claims Against Clients for (1) Emergency Prepetition Cost
21 Advances by Attorneys; and (2) Election Not to Invoice Clients for Unpaid Prepetition Costs filed
22 on September 11, 2018 [Docket No. 71] (“Order”). The Stipulation Permitting Purchase of
23 Prepetition Claims Against Clients for (1) Emergency Prepetition Cost Advances by Attorneys;
24 and (2) Election Not to Invoice Clients for Unpaid Prepetition Costs filed on September 10, 2018
25 [Docket No. 68] (“Stipulation”) was filed and the related Order uploaded shortly before the Notice
26 of Appointment of Committee was filed on September 10, 2018 [Docket No. 70].

27 The Debtor wants to discuss the proposed Stipulation with the newly appointed Official
28 Committee of Unsecured Creditors (the “Committee”) before proceeding further with the

1 Stipulation. The Debtor would not have filed the Stipulation and uploaded the Order if the Debtor
2 had known that the Committee had been appointed. The request to vacate the Order is without
3 prejudice to the Debtor seeking approval of the Stipulation or the relief requested in the
4 Stipulation at a later time.

5 Dated: September 11, 2018

6 FELDERSTEIN FITZGERALD
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8 By: /s/ Thomas A. Willoughby
9 THOMAS A. WILLOUGHBY
Proposed Attorneys for Archer Norris, a Professional
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